

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

DONALD and MARY THORNTON,                )  
  )  
  )  
PLAINTIFFS,                                    )  
  )  
VS.    )    **CASE NO.: 2:06-CV-1072-MHT**  
  )  
  )  
ROLLIN VAUGHN SOWARDS; and                )  
PROGRESSIVE INSURANCE CO.,                 )  
  )  
DEFENDANTS.                                    )

**MOTION TO COMPEL**

Come now the Plaintiffs, by and through counsel, and moves the Court for an Order compelling the Defendants to answer discovery. As grounds for said motion, movant shows unto the Court as follows:

1. On or about March 21, 2007, Plaintiffs filed their first interrogatories and production requests to Defendants.
2. Over thirty (30) days have elapsed and there has been no response.
3. On May 2, 2007 and May 15, 2007, the undersigned wrote the attorney concerning outstanding discovery and has yet to receive any response.

WHEREFORE, based upon the foregoing, movant requests an Order from the Court compelling the Defendants to answer discovery.

Respectfully submitted,

s/ William B. Alverson, Jr.

William B. Alverson, Jr.

Bar Number ASB-1162-A60W

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following attorneys:

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s/ William B. Alverson, Jr.

William B. Alverson, Jr.